

**Performance Track Teleseminar – July 26, 2005**  
**NPDES Permit Monitoring**  
**International Paper / Eastover, South Carolina**  
**Jim Witkowski**

- **International Paper Eastover Paper Mill – Background**
  - Large integrated bleached pulp and paper mill
  - Started up in 1984
- **NPDES Permit**
  - Final effluent limits
    - Both categorical and water quality based
  - “Up the pipe limits”
    - Both sanitary treatment system and bleach plants
  - Groundwater monitoring requirements
  - Very good compliance history
  - Large compliance margin

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- Pursued reduced monitoring frequencies
  - Worked in conjunction with last two permit renewals
- Generally followed approach in EPA guidance
  - *Interim Guidance for Performance-Based Reduction of NPDES Permit Monitoring Frequencies* – EPA 833-B-96-001
  - Parameter-by-parameter analysis
    - At least the most recent two years of data
    - Long-term average / Standard deviation / Coefficient of variation
- Many desired outcomes obtained (see next slide)
- Issues / Concerns
  - Backsliding and anti-degradation concerns
  - SCDHEC (South Carolina Department of Health & Environmental Control) awareness of Performance Track....and also South Carolina Environmental Excellence Program

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- **Sanitary Treatment System (Internal Outfall)**
  - BOD & TSS: Weekly > Eliminated
  - Fecal Coliform: Daily > Weekly
  - Flow: Daily > Weekly
- **Bleach Plants (Internal Outfall)**
  - Chlorinated Phenolics & Dioxin/Furan: Monthly > Annual
- **Groundwater Monitoring**
  - Frequency: Semi-annual > Annual
  - Well Network: 11 Wells > 8
  - Eliminated 4 Parameters
- **Fish Tissue Monitoring**
  - Frequency : Annual > Biennial